

SCHILLER McMAHON

LIMITED LIABILITY COMPANY

BRIAN S. SCHILLER*⁺
JOSHUA F. McMAHON*⁺

THOMAS S. MIRIGLIANO⁺
ADAM M. BROWN⁺

123 South Avenue East
Second Floor
Westfield, New Jersey 07090

T: 908-233-4840
F: 908-935-0822

Email: JFM@SchillerMcMahon.com

*Certified by the Supreme Court
of New Jersey as a Criminal
Trial Attorney

+Member of the N.J. Bars
⁺Member of the N.Y. Bars

August 16, 2018

VIA ECF

Hon. Susan D. Wigenton, U.S.D.J.
United States District Court
District of New Jersey, Newark Division
50 Walnut Street
Newark, New Jersey 07101

Re: **Greene v. Union County Prosecutor's Office, et al.**
Docket No.: 2:18-cv-08972

Dear Judge Wigenton:

As you are aware, this Office represents Plaintiff, Khaseem Greene, in connection with the above-captioned matter. Currently, a motion to dismiss Plaintiff's complaint filed by the Prosecutor Defendants is pending before Your Honor, returnable September 4, 2018; this motion date has not previously been extended or adjourned.

Plaintiff hereby invokes the provisions of L.Civ.R. 7.1(d)(5), pursuant to which the aforementioned motion date shall be extended to the next available motion day. The new motion date will be **September 17, 2018**. Plaintiff's oppositions papers shall be due **September 4, 2018** and opposing counsel shall file any reply to said opposition by **September 24, 2018**.

Please note that opposing counsel has been consulted regarding this extension, and D.A.G. McGuire has consented to it.

Very truly yours,

SCHILLER McMAHON LLC

By: /s/ Joshua F. McMahon
Joshua F. McMahon

Cc All Counsel of Record (Via ECF)